

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

In re: Robert R. McNamara,  
Debtor

The Bank of Canton  
Plaintiff,  
v.

Robert R. McNamara,  
Defendant.

Chapter 7  
Case No. 17-11329 – MSH

Adversary Proceeding No. 18-01022

**SUPPLEMENT TO JOINT PRETRIAL MEMORANDUM**

The Bank of Canton (the “Plaintiff” and or “Bank”) and Defendant/Debtor, Robert R. McNamara (the “Debtor”) hereby jointly amend and supplement Section D to their Joint Pretrial Memorandum to include testimony of the Debtor by means of deposition. This amendment is being made because, due to illness, the Debtor cannot attend or testify at trial.

**D. Testimony presented by means of deposition transcript.**

(i) Pursuant to Fed. R. Civ. P. 32(a)(4)(C), Plaintiff expects to present testimony of the Debtor by means of deposition with certain copies of referenced Exhibits thereto. The pertinent portions of said transcript which the Plaintiff may introduce are attached hereto as Exhibits A and B.

(ii) Pursuant to Fed. R. Civ. P. 32(a)(6), Debtor expects to present testimony of the Debtor by means of deposition. The pertinent portions of said transcript are attached hereto as Exhibits C and D.

Respectfully submitted by the Parties,

The Plaintiff,

The Bank of Canton,

By its Attorneys,

/s/ Michael A. Wirtz

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The Defendant,

Robert R. McNamara,

By his Attorney,

/s/ Joseph G. Butler

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Dated: February 12, 2020